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[Additional Counsel on Signature Page]
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

DONALD J. TRUMP, the Forty-Fifth President of the United States, KELLY VICTORY, AUSTEN FLETCHER, AMERICAN CONSERVATIVE UNION, ANDRES BIAGGIANI, MARYSE VERONICA JEAN-LOIUS, NAOMI WOLF, AND FRANK VALENTINE, INDIVIDUALLY AND ON BEHALF OF THOSE SIMILARLY SITUATED.

Plaintiffs.

V.

YOUTUBE, LLC, and SUNDAR PICHAI,
Defendants.

Case No: 4:21-CV-08009-JSW

CLASS ACTION

**PLAINTIFFS' RE-NOTICE OF MOTION
TO CONSOLIDATE**

Hearing Information:

Date: February 4, 2022
Time: 9:00 a.m.
Place: Submitted, or if the Court sets
an oral argument, [https://cand-
uscourts.zoomgov.com/j/1606745157?pwd=Q1FSb2lwciwS1BYUDc0L2VXekR0UT09](https://cand-uscourts.zoomgov.com/j/1606745157?pwd=Q1FSb2lwciwS1BYUDc0L2VXekR0UT09)
(Webinar ID 160 674 5157, Password 271988)
Complaint Filed: October 13, 2021
Transferred: November 4, 2021

Hon. Jeffrey S. White

RE-NOTICE OF MOTION TO CONSOLIDATE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE THAT on February 4, 2022, at 9:00 a.m., or as soon thereafter
4 as the matter may be heard, in the Courtroom of the Honorable Jeffrey S. White, Courtroom 5,
5 2nd floor of the United States District Court, Northern District of California, located at 1301
6 Clay Street, Oakland, CA 94612, Plaintiffs will and hereby do move for an order consolidating
7 the following three cases: (1) *Donald J. Trump, et al., v. YouTube, LLC, et al.*, Civ. No: 4:21-cv-
8 08009-JSW (“YouTube”); (2) *Donald J. Trump, et al., v. Twitter Inc., et al.*, Civ. No: 3:21-cv-
9 08378-JD (“Twitter”); (3) *Donald J. Trump, et al., v. Facebook Inc, et al.*, Civ. 4:21-cv-09044-
10 JSW (“Facebook”).

11 According to the Clerk's Notice dated 12/2/2021, Dkt. 126, the briefing schedule
12 remains in effect. See docket text for Dkt. 125, Responses due by 12/15/2021, Replies due by
13 12/22/2021.

14 The Motion will be based upon this Notice; the accompanying Memorandum of Points
15 and Authorities; the Declaration of M. Cris Armenta in Support of Plaintiffs' Motion to
16 Consolidate; any additional evidence or argument presented at or before the hearing on this
17 matter; and all pleadings on file in this action and in the *Twitter* and *Facebook* actions.

Pursuant to The Hon. Jeffrey S. White's Scheduling Notes, take notice that “[p]ending further order of the Court, all civil law and motion matters will be submitted on the papers. *See* General Orders 72, 73.” “If the Court determines a hearing is required, the hearing will be conducted by ZOOM or AT&T Teleconference during the Court’s normal law and motion calendar at 9:00 a.m. The Court will follow its usual procedure by posting a Notice of Tentative Ruling and/or Questions for Hearing before the hearing date.”

24 In accordance with Local Rule 1.5(n), counsel have met and conferred both
25 electronically and via direct telephone contact.

26 Dated: December 2, 2021 Respectfully submitted,

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1 By: /s/ Andrei D. Popovici
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